

JUL 19 1993

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

In the Matter of)
)
 Preparation for International) ET Docket No. 93-198
 Telecommunication Union World)
 Radiocommunication Conferences)

**COMMENTS OF
 THE WIRELESS CABLE ASSOCIATION INTERNATIONAL, INC.**

The Wireless Cable Association International, Inc. ("WCA"), by its attorneys, hereby briefly responds to the *Notice of Inquiry* in the above-captioned proceeding.^{1/}

WCA is the principal trade association of the wireless cable industry. Its members include wireless cable system operators, as well as licensees of Multipoint Distribution Service ("MDS") and Instructional Television Fixed Service ("ITFS") stations that provide the transmission capacity used by wireless cable operators to deliver cable programming to subscribers.

Over the past several years, the Commission has undertaken an extensive effort to remove regulatory obstacles to the growth of wireless cable as a viable competitor in the multichannel video distribution marketplace.^{2/} WCA urges that as preparations for

^{1/} *Preparation for International Telecommunication Union World Radiocommunication Conferences*, FCC 93-328 (rel. June 28, 1993)[hereinafter cited as "NPRM"].

^{2/} See, e.g., *Amendment of Parts 1, 2 and 21 of the Commission's Rules Governing Use of the Frequencies in the 2.1 and 2.5 GHz Bands*, 8 FCC Rcd 1441 (1993); *Amendment of Parts 21, 43, 74, 78, and 94 of the Commission's Rules Pertaining to Rules Governing Use of the Frequencies in the 2.1 GHz and 2.5 GHz Bands*, 6 FCC Rcd 6792 (1992); *id.*, 5 FCC Rcd 6410 (1990); *Definition of a Cable System*, 5 FCC Rcd 7638 (1990).

the World Radiocommunication Conferences to be conducted in 1993, 1995 and 1997 proceed, the Commission make certain that the United States can protect licensees operating in the MDS and ITFS from harmful electrical interference.

As is recognized in Paragraph 6 of the *NPRM*, among the bands allocated internationally for mobile-satellite services ("MSS") are the 2120-2200, 2483.5-2520 and 2670-2690 MHz bands. Since MDS and ITFS stations operate in the 2150-2162 and 2500-2690 MHz bands, the potential for harmful electrical interference to wireless cable from MSS is patent. The Commission has consistently recognized the importance of preserving a spectrum allocation for MDS/ITFS, the impossibility of relocating MDS/ITFS facilities to other frequency allocations, and the impracticability of sharing between MDS/ITFS and MSS.^{3/}

Simply put, WCA urges the Commission to assure that the agendas established for the World Radiocommunication Conferences in 1993, 1995 and 1997 are sufficiently flexible that the United States can continue to protect its allocation of spectrum to MDS and ITFS. If wireless cable is to emerge as an effective competitor to cable, it is absolutely essential that the MDS and ITFS facilities employed by wireless cable operators to transmit programming to subscribers be free from interference from MSS.

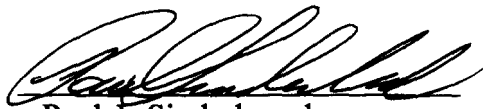
^{3/} See, e.g. *Redevelopment of Spectrum to Encourage Innovation in the Use of New Telecommunications Technologies*, 7 FCC Rcd 6886, 6888-89 (1992); *Redevelopment of Spectrum to Encourage Innovation in the Use of New Telecommunications Technologies*, 7 FCC Rcd 1542, 1544 (1992); *An Inquiry Relating to Preparation for the International Telecommunication Union World Administrative Radio Conference for Dealing with Frequency Allocation in Certain Parts of the Spectrum*, 6 FCC Rcd 1914, 1916 (1991).

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In planning for and participating in the upcoming World Radiocommunication Conferences, the United States will have to be diligent in protecting its ability to protect the wireless cable industry.

Respectfully submitted,

THE WIRELESS CABLE ASSOCIATION
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July 19, 1993